

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY,

Plaintiff,

v.

CREDIT SUISSE FIRST BOSTON MORTGAGE
SECURITIES CORP.; MORTGAGE ASSET
SECURITIZATION TRANSACTIONS, INC.; DLJ
MORTGAGE CAPITAL, INC.; UBS REAL ESTATE
SECURITIES INC.; CREDIT SUISSE SECURITIES (USA)
LLC; UBS SECURITIES LLC; LEE FARKAS; PAUL R.
ALLEN; RAY BOWMAN; DELTON DE'ARMAS;
DESIREE E. BROWN; ANDREW A. KIMURA; JEFFREY
A. ALTABEF; EVELYN ECHEVARRIA; MICHAEL A.
MARRIOTT; THOMAS ZINGALLI; DAVID MARTIN;
PER DYRVIK; HUGH CORCORAN; and PETER
SLAGOWITZ,

Defendants.

No. 3:11-cv-30048-MAP

**ASSENTED-TO MOTION FOR EXTENSION OF
DEFENDANTS' TIME TO RESPOND TO THE COMPLAINT**

Defendants Credit Suisse Securities (USA) LLC and UBS Securities LLC

("Defendants"), hereby move for an extension of their time to answer the complaint filed by Plaintiff Massachusetts Mutual Life Insurance Company ("Plaintiff") in the above-captioned action (the "Action"), as stipulated to by the parties, through their undersigned counsel, as set forth below. Plaintiff, through its undersigned counsel, assents to the motion.

On February 25, 2011, Plaintiff commenced the above-captioned action by filing a complaint ("Complaint") in the United States District Court for the District of Massachusetts against Defendants.

By Memorandum and Order entered on February 14, 2012, the Court granted in part and denied in part Defendants' motions to dismiss the Complaint and directed Defendants to serve and file answers within twenty (20) days of the Court's Order.

Counsel for Plaintiff and counsel for Defendants conferred and have stipulated and agreed, subject to the approval of the Court, as follows:

1. The Defendants shall answer the Complaint on or before March 20, 2012.
2. By filing this motion, Plaintiff and Defendants do not waive, and expressly preserve, any and all rights and defenses, including but not limited to the right to replead or amend the allegations in support of any claims or assert any defenses relating to jurisdiction, venue, arbitration, service of process and statute of limitations or any counter-claims that may be available in this Action.

WHEREFORE, the parties respectfully request that this Court:

1. Grant the instant motion to enter an Order per the terms stipulated to by the parties, as set forth herein.
2. Grant such further relief as may be just and proper.

March 2, 2012

Respectfully submitted,

/s/ Edward J. McDonough, Jr.

Edward J. McDonough, Jr. (BBO 331590)
Stephen E. Spelman (BBO 632089)
EGAN, FLANAGAN AND COHEN, P.C.
67 Market Street, P.O. Box 9035
Springfield, Massachusetts 01102
ejm@efclaw.com
ses@efclaw.com

Of Counsel

Philippe Z. Selendy
Jennifer J. Barrett
QUINN EMANUEL URQUHART &
SULLIVAN LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010-1601

*Counsel for Plaintiff Massachusetts Mutual
Life Insurance Company*

/s/ Jonathan Sablone

Jonathan Sablone (BBO 632998)
Matthew T. McLaughlin (BBO 660878)
NIXON PEABODY LLP
100 Summer Street
Boston, Massachusetts 02110
jsablone@nixonpeabody.com
mmclaughlin@nixonpeabody.com
*Counsel for Defendant Credit Suisse Securities
(USA) LLC*

Of Counsel

Richard W. Clary
(*pro hac vice*)
Julie A. North
(*pro hac vice*)
Michael T. Reynolds
(*pro hac vice*)
CRAVATH, SWAINE & MOORE LLP
825 Eighth Avenue
New York, New York 10019
(212) 474-1000

*Counsel for Defendant Credit Suisse Securities
(USA) LLC*

By: /s/ Azure Abuirmeileh
Kathy B. Weinman (BBO 541993)
Azure Abuirmeileh (BBO 670325)
COLLORA LLP
600 Atlantic Avenue
Boston, Massachusetts 02210
Tel: (617) 371-1000
Fax: (617) 371-1037
kweinman@collorallp.com
aabuirmeileh@collorallp.com

Of Counsel

Thomas C. Rice

(pro hac vice)

David J. Woll

(pro hac vice)

Alan Turner

(pro hac vice)

Jason R. Meltzer

(pro hac vice)

SIMPSON THACHER & BARTLETT LLP

425 Lexington Avenue

New York, NY 10017

Tel: (212) 455-2000

Fax: (212) 801-2502

trice@stblaw.com

dwill@stblaw.com

aturner@stblaw.com

jmeltzer@stblaw.com

Counsel for Defendant UBS Securities LLC

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 2nd day of March, 2012.

/s/ Jonathan Sablone
Jonathan Sablone